

Hon. Marsha J. Pechman

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

TYRONE JOHNSON,
Plaintiff,
vs.
CITY OF OLYMPIA, et al.,
Defendants

NO. 3:17-cv-05403-MJP

**STIPULATION AND AGREED
PROTECTIVE ORDER**

IT IS HEREBY STIPULATED by and between Beverly Grant and Elizabeth Lunde, counsel for Plaintiff herein, and John E. Justice, counsel for Defendants herein, that any records produced by the City of Olympia, in response to the Court's May 9, 2018 Order (Dkt. No. 44), will not be disclosed by plaintiff's counsel to anyone other than the attorneys of record or their retained experts, and plaintiff's counsel will return the produced employment records at the conclusion of this case. This stipulation does not address the use of these records in court proceedings in the above captioned case. Any such use will, if necessary, be addressed by motion.

**STIPULATION AND AGREED PROTECTIVE
ORDER – 1**
Cause No.: 3:17-cv-05403-MJP

*LAW, LYMAN, DANIEL,
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1 Stipulated to this 23rd day of May, 2018.

2 LAW, LYMAN, DANIEL, KAMERRER BEVERLY GRANT LAW FIRM, P.S.
3 BOGDANOVICH, P.S.

4 *s/ John E. Justice*

5 *s/ Beverly Grant*

6 John E. Justice, WSBA No. 23042
7 Attorneys for Defendants

8 Beverly Grant, WSBA No. 8034
9 Elizabeth Lunde, WSBA No. 51565
10 Attorneys for Plaintiff

**STIPULATION AND AGREED PROTECTIVE
ORDER – 2**
Cause No.: 3:17-cv-05403-MJP

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ORDER

2 THIS MATTER having come on before the above-entitled court upon stipulation of
3 counsel, the court having examined the records and being fully advised in the matter, now,
4 therefore, IT IS HEREBY ORDERED that any records produced by the City of Olympia, in
5 response to the Court's May 9, 2018 Order (Dkt. No. 44), will not be disclosed by plaintiff's
6 counsel to anyone other than the attorneys of record or their retained experts, and plaintiff's
7 counsel will return the produced employment records at the conclusion of this case. This
8 stipulation does not address the use of these records in court proceedings in the above
9 captioned case. Any such use will, if necessary, be addressed by motion.
10

DONE IN OPEN COURT this 23rd day of May, 2018.

Marsha J. Pechman
Marsha J. Pechman
United States District Judge

Presented by:

17 | LAW, LYMAN, DANIEL, KAMERRER
BOGDANOVICH, P.S.

19 s/ John E. Justice
John E. Justice, WSBA No. 23042
20 Attorneys for Defendants

21 **Approved as to form and
notice of presentation waived:**

BEVERLY GRANT LAW FIRM, P.S.

24 *s/ Beverly Grant*
25 Beverly Grant, WSBA No. 8034
Elizabeth Lunde, WSBA No. 51565
Atorneys for Plaintiff

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**STIPULATION AND AGREED PROTECTIVE
ORDER – 3**
Cause No.: 3:17-cv-05403-MJP